

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Eugene Westmoreland,)
)
 Plaintiff,) No.: 23-cv-1851
)
 v.)
)
 Cook County Sheriff Thomas Dart, et al.) Judge Tharp, Jr.
)
 Defendants.)

**DEFENDANTS' AGREED MOTION FOR EXTENSION
OF TIME TO COMPLETE LIMITED EXPERT DISCOVERY**

NOW COME Defendants COOK COUNTY SHERIFF THOMAS DART, and COOK COUNTY, a body politic and corporate, by and through their attorneys, Jason E. DeVore and Zachary G. Stillman, of DeVore Radunsky LLC, pursuant to Fed. R. Civ. P. 6(b), and for Defendants' Agreed Motion for Extension of Time to Complete Limited Expert Discovery, state as follows:

1. The parties are presently well on their way to completion of discovery, including expert discovery. Plaintiff's expert's deposition is presently scheduled for May 23, 2024. Defendants' Expert's deposition is presently scheduled for June 3, 2024.
2. The present deadline for completion of Expert Depositions is June 1, 2024. ECF No. 48.
3. Despite diligent efforts at adhering to the presently set deadline, the parties were unable to schedule Defendants' expert's deposition prior to the close of expert depositions. The deposition is currently scheduled for June 3, 2024, two days after the deadline for completion of expert depositions.
4. In the interest of adhering to this Court's deadlines, and in consideration of the parties' schedules, Defendants respectfully request that this Court grant the parties an

additional two days, up to and including June 3, 2024, to complete discovery with respect to the deposition of Defendants' Expert, Carl Darr *only*.

5. The parties agree that they will take no depositions other than those identified in this motion.
6. Under Rule 6(b), this Court may, for good cause, extend the time “[w]hen an act may or must be done.” Fed. R. Civ. P. 6(b).
7. Not granting an extension would prejudice the parties because the current June 1, 2024, deadline will not allow sufficient time to schedule and complete the deposition of Defendants' expert witness.
8. Granting an extension of time will not prejudice any party and this motion is not brought for undue delay or any improper purpose.
9. Counsels for Plaintiff have indicated their agreement to this motion.

WHEREFORE, Defendants respectfully request that this Honorable Court enter an order as follows:

1. Defendants' Agreed Motion for Extension of Time is granted;
2. The deadline for completion of Expert Depositions will be extended by two days, up to and including June 3, 2024, for completion of discovery with regard to the above described deposition *only*.

Respectfully Submitted,

Defendants

By: /s/ Jason E. DeVore
Jason E. DeVore, One of the Attorneys
for Defendants

DEVORE RADUNSKY LLC

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that Defendant's Motion for Extension of Time to Complete Expert Depositions was filed on May 1, 2024, with the Northern District of Illinois ECF System, serving a copy to all parties.

/s/Zachary Stillman
Zachary Stillman